

October 2, 2007

Ms. Marlene Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: *Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina On Communications Networks*, EB Docket No. 06-119; WC Docket No. 06-63

Dear Ms. Dortch,

We are writing in support of the definitional framework set out by AT&T Services, Inc. in its Notice of Ex Parte Filing dated September 27, 2007, (hereinafter referred to as the "AT&T Ex Parte Filing") which goes towards addressing wireless industry concerns regarding back-up power requirements at wireless telecommunications facilities should the Commission decide to promulgate such rules.¹ We believe that this framework more appropriately balances the Commission's concern for wireless network dependability during power failures with the realities of distributed antenna systems (hereinafter referred to as "DAS") and other innovative wireless sites.

The DAS Forum agrees that our nation's wireless infrastructure is composed of a wide variety of site types operating in diverse environments, and in accordance with a complex array of contractual and regulatory obligations. Accordingly, we support the exclusion of "distributed antenna systems ("DAS"), repeaters, micro sites, femto-sites and related equipment" (hereinafter referred to as "alternative sites") from the Section 12.2(a)(1) definition of "cell site" subject to back-up power requirements as proposed in AT&T's Ex Parte Filing. This exclusion is appropriate given the unique design and power supply of such alternative sites, which are deployed in unique circumstances in which a macro cell site is particularly infeasible. DAS installations are typically deployed as multi-node cell sites, using unobtrusive design elements where space is at a premium. This makes the required addition of back-up power sources

¹ The DAS Forum is a national association dedicated to furthering the understanding of particular issues associated with the deployment of DAS. It is the only national network of leaders focused exclusively on shaping the focus of DAS as a viable complement to traditional macro cell sites. The DAS Forum is an avenue to facilitate the further development of widespread dependable communications networks across the country. The DAS Forum membership includes virtually every DAS provider, as well as several CMRS carriers deploying DAS as part of their networks, and many wireless industry representatives.

especially problematic from a design perspective. In addition, because of the multi-nodal nature of DAS, the impact of a partial power failure to a DAS network is generally far less than the impact created by the loss of power to a macro cell site.

We support the efforts of the Commission to ensure the operation of wireless networks during power failures. We respectfully request that the Commission reconsider its rule by exempting all alternative site deployments.

In accordance with the Commission's rules, this letter is being filed electronically with your office for inclusion in the public record.

Best Regards,

Jacqueline McCarthy, Esq.

Director of Government Affairs

The DAS Forum

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